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Docket

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**Boehringer Ingelheim
Pharmaceuticals, Inc.**
a subsidiary of
Boehringer Ingelheim Corporation
90 East Ridge
P.O. Box 368
Ridgefield, Connecticut 06877

December 18, 1987

NIOSH
Mail Stop D-37
1600 Clifton Rd. N.E.
Atlanta, GA 30333

RE: PROPOSED 42 CFR PART 84

Dear Sir/Madam:

Regarding the proposed standard, 42 CFR 84, National Institute for Occupational Safety and Health Revision of Tests and Requirements for Certification of Permissibility of Respiratory Protective Devices Used in Mines and Mining, I would like some clarification on certain points that have presented themselves while reading this document.

1. According to the definition of "Respirator" in the proposed standard it is a device only used by individuals in the mining industry. Will separate standards be developed for those individuals that are not in the mining industry but do have a need for respirators?
2. How many of the "certified" respirators currently on the market would meet the proposed standards?
3. Those respirators that do not meet the criteria of the proposed standard would have to be replaced at possible great expense to industry, not only in replacing the respirators, the cartridges and spare parts, but also the refitting of the new respirators. Have these factors been taken into account when the monetary impact of the proposed rule was investigated?
4. The proposed rule implies that fit testing is not necessary since the respirator is certified to fit workers of a certain face size. Is this implication correct? Will there be face sizes that are not covered? My experience with fitting respirators does not indicate that a worker's face size alone determines the best fit.
5. Will manufacturers be able to comply with the testing standards that at this time have not yet been published?

Boehringer Ingelheim Pharmaceuticals, Inc.

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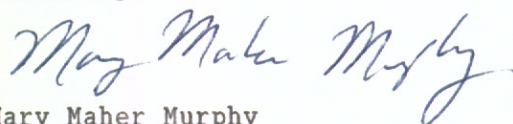
6. The proposed rule requires that gas and vapor respirators be equilibrated at 85% relative humidity, then tested at 85% relative humidity with a 50 minute service life requirement. Are these proposed requirements for chemical cartridge respirators consistent with the needs of industry? In our industry, which is conducted mainly indoors, we rarely have a relative humidity over 50 %. Perhaps there should be two different standards?
7. Should oil mist loading tests be required for all respirators? Our company has many applications where we have only solid aerosol contaminants and I would prefer a more comfortable respirator for the employees while still keeping the appropriate safety factor. Again, should there be two different standards?
8. I am assuming that this proposed standard, should it become law, will be adopted by OSHA and that industry's respirators will have to follow those that have been promulgated for the mining industry only. Is this a correct assumption?

Certification of respirators is very important to industry for it relieves us of the time needed to thoroughly investigate each respirator and company for its conformance to applicable standards. However, we do not want standards that are not relevant to the type of work that is being done, imposing a type of respirator that would be very heavy and bulky when this would not be necessary for the job that is to be performed. The health and safety of the employee is of course paramount, however when a more comfortable respirator can afford the proper protection I would prefer that this would be worn. Not only would it be less work physically for the employee (the larger respirator will offer greater resistance in breathing), but the overall comfort factor will be improved.

I strongly disagree with the proposed standard as it is currently published. It does not take into account the many other industries, including the pharmaceutical industry, which currently use respirators. They have needs that are not the same as those of the mining industry. In many cases less stringent regulations would suit our requirements much better for certain applications.

I thank you for considering these questions and appreciate your answering them in a timely manner.

Sincerely,



Mary Maher Murphy
Corporate Industrial
Hygiene Specialist